

ActBlue

14 Arrow Street
Cambridge, MA 02138

(617) 517-7600 PHONE
(617) 517-7601 FAX

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March 23, 2011

Rosa Lewis
Senior Campaign Finance Analyst
Reports Analysis Division
Federal Election Commission
Washington, DC 20463

Re: RFAI concerning October 2010 Monthly Report

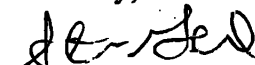
Dear Ms. Lewis,

This letter is in response to your Request for Additional Information dated February 23, 2011. In that letter, you identified payments made by a connected organization to ActBlue's federal account. The payments you reference are offsets to ActBlue's operating expenses for items such as rent. The payer of these offsets is not a connected organization, but rather a related organization to ActBlue (as defined by the Internal Revenue Code) which shares some office resources. ActBlue's operating expenses are not subsidized by any other organization, and as refunds to ActBlue for that portion of resources used by the related organization, these payments do not run afoul of 2 U.S.C. § 441b which you referenced in your letter. We are in the process of amending this report to move these offset payments to the correct line of the Detailed Summary Page, Line 15.

Your letter also identifies conduit contribution entries on Schedule A of our report which did not have a corresponding disbursement entry on Schedule B. This was the result of technical errors in the preparation of our reports, combined with unexpected contributor information. For instance, one contributor provided a series of numbers instead of name information, causing the technical errors. We have taken steps to ensure that these problems are not repeated, and we are in the process of amending these transactions to correct the contributor information and include the disbursements for these contributions on Schedule B.

I believe this addresses all of the concerns raised in your letter. If you require any further information, please do not hesitate to contact me by return mail, or by phone at (617) 517-7636.

Sincerely,




Steven Gold
General Counsel

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Federal Election Commission
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